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ALDA/Potomac
c/o Northern Va. Resource
Center for Deaf and Hard
of Hearing Persons
10363 Democracy Lane
Fairfax, Virginia 22030
February 27, 1996

Office of the Secretary
Federal Communications Commission
1919 M St., NW
Washington, DC 20554

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RE: CC Docket No. 95-176

To Whom It May Concern:

Our group of late-deafened adults in the Washington, D.C. metropolitan area appreciates the opportunity to comment regarding closed captioning. Closed captioning has brought great social, psychological, and educational benefits to late deafened adults. Many of us grew up with normal hearing then in adulthood lost our hearing, sometimes quite suddenly. We found ourselves cut off from the hearing world unready by training or cultural background to become fully integrated in the Deaf community. The appearance of closed captioning did much to reestablish ties with the world from which hearing loss had excluded us.

The growing population of the elderly, many of whom gradually become hard of hearing, also benefits greatly from closed captioning of television and films. Even a small hearing loss becomes a serious obstacle to understanding when the impaired hearer can't ask the speaker to repeat himself. Similarly, persons learning English as a second language are benefited by captioning, as are those with audio/speech related learning disabilities.

Generally, closed captioning has become increasingly available for most program sources. An important exception is cable TV. At least until cable TV greatly increases its use of closed captioning, we believe it only fair that cable companies charge their hearing impaired customers based on the proportion of shows that are captioned. Public television, to be commended for its early adoption of captions while others lagged behind, often does not have feature captions on Saturday night movies and for shows after 10 PM. Some of these are foreign made (British); still, they are of great interest to PBS fans. It is unfortunate that the U.K. and the U.S. do not share the same captioning system, as we understand many of these imports are now captioned in the U.K.

Our group contends that captioning should be like sound, inseparable from the program. Two problems arise: captioning may deteriorate, or different versions of the same show may be made and a station may not air the one with closed captions. The latter occurs on two PBS stations (32 and 53) when showing reruns of Mystery and Masterpiece Theater.

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List A B C D E

Another availability problem is incorrect labelling of programs in television guides as being either captioned or not captioned.

Co-display of emergency announcements and captioning are also a problem. Both should be visible to the viewer. During a recent blizzard, some local stations put emergency information on the bottom of the screen, reduced the regular picture size and eliminated captions altogether. We recommend a system whereby emergency information is displayed in a "crawler" across the bottom of the screen, while captions are temporarily switched to the top. This was done by one station in our area.

Regarding program types, we believe that entertainment is well captioned, as is national news. Public affairs captioning has been increasing, and recently expanded to "Washington Week in Review." Local news captioning on cable is poor; in our area network local news now has more captions. Coverage, however, is spotty being only available at certain times with caption quality varying from station to station. All news broadcasts, we feel, should have real time captioning. Otherwise, captions and speech are out of "sync" and late breaking news is not available.

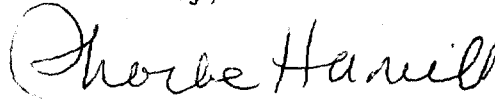
As for commercials, everyone makes fun of them but in fact they are vital to consumers trying to make sound buying decisions. Yet few advertisers seems to be seeking out the deaf and hearing-impaired market even though this market is huge. Even the Super Bowl did not have captioned ads.

For all the reasons given above, we are delighted that the Telecommunications Reform Act of 1996 has made captioning generally mandatory. We recommend an advisory group be established to make sure that captions fit their particular audience. Quality standards of some type should be established. This is especially important for real time captioning, where errors cannot be corrected. Captioners should be court reporters certified at a given (fast) speed. The advisory group could investigate ramifications of any standards proposed. For example, an inflexible requirement to transcribe every word might, in some cases, cause a lag in the dialog. Or, if captions are required to be as slow as the lowest common denominator in the viewing population, there will surely be a lag. Likewise, if carried to extreme, identification of each speaker will cause a lag. Our constituency of late deaf are all good readers and we want captions that synchronize with the speech.

Although not the subject of your inquiry, our members note a lack of captioning in educational/instructional videos both in stores and in public institutions such as schools. Even for those fluent in sign language, interpreters cannot replace closed captions in such instances because it is very difficult to watch an interpreter and a video at the same time. One of our members noted that a public school called in an interpreter for a driver's ed video, when many of the students were foreign-born and would have benefited from the closed captions.

We trust our comments are helpful. Please let us know if you would like further information on our group's perspective.

Sincerely,

A handwritten signature in cursive script that reads "Phoebe Hamill". The signature is written in dark ink and is positioned above the printed name and title.

Phoebe Hamill
President, ALDA/Potomac